

Without accurate confirmation notices and usage data, similar problems will continue to occur, absorbing excessive amounts of staff time and creating customer confusion and frustration.

#### **4. Coaches Hotline**

Our Coaches Hotline account also has been plagued with problems since December 1996. Ameritech indicated that Coaches Hotline would have LCI service by December 23, 1996, but on January 2, our customer informed us that the service change had not taken place. See Exhibit C.

LCI made a second provisioning request on January 30, which Ameritech failed to install correctly. See Exhibit U. During the install, Ameritech neglected to transfer the fourth line of the customer's hunt group, making only three of 29 lines properly usable for a period of over two months.

Ameritech's failure to provide timely usage data prevented LCI from identifying Ameritech's provisioning error before the problem occurred. Instead, the customer itself caught the error during a busy business day when its phones could not properly handle a large volume of incoming calls. While Coaches Hotline's service problems were resolved in March, as of today, Ameritech and LCI have not reached final agreement on an appropriate credit amount.

#### **5 Mark IV Realty**

On April 28 and May 1, LCI sent Ameritech information regarding several unidentifiable ANIs. See Exhibits V, W, X, and Z. Ameritech first told LCI that the ANIs were ours, but later indicated that the ANIs belong to Ameritech. Nearly four weeks later, this seemingly straightforward issue of who provides service to which ANIs remains unresolved. Most recently, Ameritech informed us that Mark IV's long distance PIC is AT&T and its intraLATA toll and local PIC is Ameritech. Yet LCI continues to receive large volumes of local usage for this customer, and, according to Mr. O'Sullivan, Ameritech remains "baffled." See Exhibit W.

#### **B. Failure to provide timely and accurate information essential to billing**

LCI depends on timely and accurate data on daily usage and monthly recurring charges to bill its customers. Because Ameritech consistently has failed to provide this data, LCI's billing processes have suffered.

1. **General usage problems**

Over a month ago, LCI provided Ameritech with a list of 168 telephone numbers ("TN") for which we have received no usage. See Exhibit Z. To date, Ameritech has researched only 30 of these TNs. In researching this issue, Ameritech staff noted that

One other consideration is the date when work was completed on the particular TN. (e.g., 773-637-6071 was on an order having an [Ameritech] due date of 2-21-97, it appears in the guide with an active date of 3-7-97; the order was not completed until 4-3-97)

See id. Thus, Ameritech's failure to complete orders accurately has contributed directly to usage problems. Furthermore, LCI apparently cannot rely on Ameritech due dates for completing orders. As noted, Ameritech indicated that it would complete the order mentioned by February 21, yet Ameritech did not complete the order until well over one month later. LCI must be able to rely on information provided by Ameritech.

2. **Daily usage file timeliness**

Timely daily usage is critical to LCI's billing operations. Without usage data, LCI cannot bill its customers. LCI receives essentially no call record information from Ameritech within 24 to 36 hours. Moreover, while Ameritech has promised to provide all daily usage data within 72 hours of the call date, LCI receives over 40% of the data late.

We first informed Ameritech of daily usage file problems on December 16, 1996. My staff and I followed up on this issue with letters dated January 29, February 19, March 26, April 9, and May 20, but Ameritech still has not brought us to parity. See Exhibits D, F, N, O, and X. Ameritech has this call record information available to it at the time the call passes through the switch. I see no reason, technological or other, why Ameritech cannot meet or beat its 72 hour contractual commitment to LCI. In fact, parity demands that LCI should receive access to usage data as LCI calls pass through the Ameritech switch.

Adding to our frustration was Ameritech's upgrading of the usage software it uses for resellers without informing LCI, which created additional delays. See Exhibit X. Ameritech needs to coordinate software and related service changes with LCI in order to resolve issues before problems emerge.

3. **Ameritech's Electronic Billing System (AEBS) timeliness**

Since our resale relationship began last year, LCI has received AEBS data sporadically:

- November data received via tape on 1/6;
- December data received via tape on 1/14;
- January data received via Connect:Direct on 3/1;
- February data received via Connect:Direct on 3/26;
- March AEBS data received via Connect:Direct on 4/17; and
- April AEBS data received via Connect:Direct on 5/16 -- note that your staff expressly guaranteed that we would receive April AEBS data by May 12.

See Exhibits S and X. Delayed AEBS data creates billing problems that adversely affect LCI's standing with existing and potential customers.

LCI first requested timely monthly recurring charge and non-recurring charge data on November 11, 1996. See Exhibit S. We reiterated our need via letter on January 29, February 19, April 29, and May 20. See Exhibits D, F, S, and X. As of today, we still have not received an outline of the process by which Ameritech will bring LCI to parity.

4. **Resulting billing problems**

Ameritech's failure to provide timely usage and AEBS data creates local and long distance billing delays. Late data directly causes late billing, and our new local customers have complained about not receiving local billing as quickly as they received bills when Ameritech provided their local service. For customers who want a combined local and long distance bill, receiving late data has forced LCI to delay billing customers for as many as five days.

LCI has devoted substantial efforts in attempting to get timely billing information from Ameritech, but Ameritech still consistently fails to meet agreed upon deadlines. See Exhibits D, F, N, O, S, and X. We cannot effectively compete with Ameritech in local markets if we cannot meet customer expectations, and we cannot meet customer expectations while Ameritech prevents LCI from achieving billing parity.

C. **Failure to provide accurate and timely provisioning information**

In order to provision accounts correctly, LCI needs complete access to grandfathered Ameritech products and USOCs.

1. **Grandfathered Ameritech products**

Internal Ameritech billing problems have made seemingly simple provisioning transactions monumentally difficult. Even though our agreement with Ameritech, Ohio states specifically that "Ameritech agrees to make Grandfathered Services available to LCI for resale," see Exhibit 2 at 3.1, Ameritech is unable to provide usage data for grandfathered products, apparently because of incompatibilities between Ameritech's old and new billing systems. As noted, Ameritech seems to maintain two billing systems, an old system for accounts with grandfathered products and a new system for other accounts. Problems with grandfathered products remain unresolved five months after they were first identified by LCI to Ameritech.

2. **Regularly updated USOC information**

Ameritech does not provide LCI with up-to-date USOC information, which LCI understands is revised monthly. Without up-to-date USOC information, we cannot correctly provision customer orders. LCI should receive access to USOC information on Ameritech's world wide web site, and, additionally, Ameritech should provide LCI with diskette updates of USOC information, including USOC name, plain English definition, rate by state, whether the USOC is associated with a term contract (and if so, indicate the contract length), whether the USOC is for business or residential customers, and whether the USOC is resellable.

Ameritech's failure to provide parity of access to important USOC information on a timely basis is a serious impediment to competition. Again, repeated requests have failed to resolve this issue.

D. **Failure to develop an adequate electronic data interchange ("EDI") system**

LCI currently is working with Ameritech to test and implement Ameritech's interpretation of the EDI guidelines, which we find woefully inadequate. Ameritech seems to take the position that simply developing an EDI system is enough. This position is incorrect. Ameritech must develop a complete EDI system. At a minimum, a complete EDI system must prevent existing problems from occurring, minimize order entry effort, provides access to internal ordering and billing status reports, and support all products, including UNEs.

LCI has received no assurances from Ameritech that its EDI system will correct existing OSS problems. Fully implementing the electronic interface without engineering solutions to avoid known problems will serve only to increase the number of problems as volume rises. Existing problems in today's environment have stretched LCI and Ameritech staff thin, and if Ameritech continues to develop an EDI system that does not

eliminate known problems, neither company will have the staff resources to resolve the vast number of issues that will result as the number of orders increases.

Currently, Ameritech's practice is to halt the editing process when it encounters the first error, instead of validating the entire service request. This means that LCI can make only one correction before it submits a revised request. Once the next release of the OSS gateway is implemented, Ameritech plans to provide up to 10 error messages per account and 10 error messages per line in each acknowledgment.

Under Ameritech's planned EDI system, LCI will not have access to status reports in Ameritech's internal systems that track ordering and billing. Without access to LCI accounts in Ameritech's internal systems, LCI will continue to lack the ability to resolve problems proactively. Electronic interfaces do not by themselves guarantee that an order successfully has navigated all the systems necessary for routing usage and billing information to LCI. For example, an order may complete the ordering process successfully, but fail in Ameritech's message guide system. Without access to the guide system, LCI will have to monitor line usage to confirm that Ameritech properly has filled the LCI order, which results in delayed customer billing.

Furthermore, Ameritech's planned EDI interface will not support UNE ordering. For UNEs, Ameritech plans to continue to maintain a wholly separate system, which does not follow EDI guidelines. This will require LCI to build another application and gateway to order UNE products.

Ameritech's EDI system as planned will not support increased competition; rather, it will increase the degree and scope of errors. At a minimum, until Ameritech commits to developing an EDI system that prevents existing problems from occurring, minimizes order entry effort, provides access to internal ordering and billing status reports, and support all products, OSS parity will not and cannot exist.

\* \* \*

While this letter and exhibits is not intended to be an exhaustive description of LCI's difficulties with Ameritech, taken as a whole our experience to date demonstrates that Ameritech, both intentionally and through apparent understaffing and prolonged inattention to our repeated and documented request for help with problems created by Ameritech's systems, has engaged in a pattern of behavior designed to frustrate competition to the detriment of LCI and consumers.

LCI has worked hard and conscientiously to resolve customer problems with Ameritech, but has been met frequently with lack of meaningful response. We are

Mr. Neil Cox  
May 22, 1997  
Page 13 of 13

deeply concerned that despite public pronouncement that Ameritech's local markets are open to competition, the fact that is that, even at the minuscule scale at which competition exists today, Ameritech has not staffed to handle the problems, nor has it taken the steps necessary to convert its computer systems to operate in a manner which gives competitors and equal chance at Ameritech's current customer base.

These issues are critical to developing real competition in local markets, and need to be addressed by Ameritech immediately.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne K. Bingaman" with a stylized flourish at the end.

Anne K. Bingaman



100"

1 BEFORE THE PUBLIC UTILITIES COMMISSION

2 IN AND FOR THE STATE OF CALIFORNIA

3 — o0o —

4 MCI TELECOMMUNICATIONS CORPORATION,  
Complainant,

5 vs. NO. 96-12-026

6 PACIFIC BELL AND PACIFIC BELL COMMUNICATIONS,  
Defendants.

7

8 AT&T COMMUNICATIONS OF CALIFORNIA, INC.  
Complainant,

9 vs. NO. 96-12-044

10 PACIFIC BELL,  
Defendant.

11 \_\_\_\_\_ //

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13

14

DEPOSITION OF ANN MARIE LONG

15

March 21, 1997

16

Volume I, Pages 1 through 148, inclusive

17

18 REPORTED BY:

SANDRA L. CARRANZA, CSR NO. 7062, RPR

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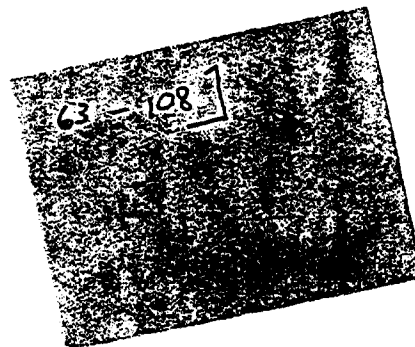
25

0002

1

INDEX

2 DEPOSITION OF ANN MARIE LONG





5 BY: ED KOLTO-WININGER, ATTORNEY AT LAW  
235 Montgomery Street  
San Francisco, California 94104

6

7 FOR MCI:

8 LeBOEUF, LAMB, GREENE & MacRAE  
9 BY: THOMAS E. McDONALD, ATTORNEY AT LAW  
One Embarcadero Center, Suite 400  
San Francisco, California 94111

10

and

11

MCI

12 BY: EVELYN C. LEE, ATTORNEY AT LAW  
201 Spear Street  
13 San Francisco, California 94105

14 FOR AT&T:

15 AT&T  
16 BY: JULIAN C.L. CHANG, ATTORNEY AT LAW  
795 Folsom Street, Suite 670  
San Francisco, California 94107

17

18 FOR BROOKS FIBER COMMUNICATIONS OF SAN JOSE, INC.  
19 BY: GLENN A. HARRIS  
464 Oakmead Parkway  
Sunnyvale, California 94086

20

21 — o0o —

22 TAKEN AT:

23 LeBOEUF, LAMB, GREENE & MacRAE  
One Embarcadero Center, Suite 400  
24 San Francisco, California 94111

25 — o0o —

0004

1 BE IT REMEMBERED THAT, pursuant to

2 Notice of Taking Deposition and on Friday, March 21, 1997,

3 commencing at the hour of 9:45 a.m., before me, SANDRA L.

4 CARRANZA, CSR NO. 7062, RPR, there personally appeared

5

6 ANN MARIE LONG,

7

8 called as a witness by the Complainants, who, having been  
9 first duly sworn, was examined and testified as  
10 hereinafter set forth.

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0005

1                   ANN MARIE LONG

2           having been duly sworn, testified as follows:

3

4                   EXAMINATION BY MR. McDONALD

5           MR. McDONALD: Q. Ms. Long, can you state your  
6 name and spell it.

7           A. Ann, A-n-n, Marie, M-a-r-i-e, Long, L-o-n-g.

8           Q. Can you state your business address.

9 A. 370 Third Street, Room 307, San Francisco,  
10 California, 94107.

11 Q. Have you ever been a witness in a proceeding  
12 before?

13 A. No.

14 Q. I'll be asking you a series of questions and it  
15 will be necessary for you to respond orally so that --  
16 rather than through a gesture or a nod or something like  
17 that, you will have to speak so that the court reporter  
18 can take down your answer.

19 In addition, we may have a tendency to start  
20 speaking over one another, but you may anticipate where my  
21 question is going and attempt to answer it before I finish  
22 the question. It will be helpful for the court reporter  
23 if you wait for me to finish, so that she can take down  
24 everything that I say and then take down your response,  
25 okay?

0006

1 A. Okay.

2 Q. And if you don't understand the question, feel  
3 free to ask me to clarify it. Make sure that you  
4 understand the question I am asking, okay?

5 A. Okay.

6 Q. Can you tell us your current title?

7 A. Business manager.

8 Q. You are employed by Pacific Bell?

9 A. Yes.

10 Q. Where are you the business manager?

11 A. At 370 Third Street.

12 Q. Is that within a division or a group within

13 Pacific Bell?

14 A. Yes.

15 Q. What group is that?

16 A. Industry marketing.

17 Q. That is the extent of your title, business

18 manager?

19 A. Yes.

20 Q. In that position do you have specific functions

21 that you serve?

22 A. Yes.

23 Q. What are those?

24 A. It's a large variety of functions. I think you

25 have to be more specific.

0007

1 Q. Well, what do you work on?

2 A. Resale.

3 Q. Anything else?

4 A. No.

5 Q. So your functions are exclusively dealing with

6 resale?

7 A. Yes.

8 Q. How long have you held that position?

9 A. Since July 1st of 1995.

10 Q. Prior to that, were you employed by Pacific

11 Bell?

12 A. Yes.

15 A. About a year and a half.

16 Q. So sometime in 1993 or early --

17 A. Exactly, May of '93 through the end of June of  
18 '95.

19 Q. Prior to that time, were you employed by  
20 Pacific?

21 A. Yes.

22 Q. What position did you hold prior to May of '93?

23 A. I was in the same type of a job, just a  
24 different department.

25 Q. So you were a business manager again?  
0009

1 A. Yes, I was.

2 Q. What was the department?

3 A. It was the retail channel.

4 Q. Which retail channel this time?

5 A. It was the billing validation group.

6 Q. What function did that group serve?

7 A. The same function as the other group, but the  
8 customer base that we handled was a smaller customer than  
9 the national public sector customers.

10 Q. Smaller in terms of the size of the customer?

11 A. Yes.

12 Q. What was billing validation, what did that  
13 involve? I don't think you mentioned that with the  
14 subsequent position, the retail channel dealing with large  
15 public sectors.

16 A. We validated customer accounts for accuracy.

19 A. Yes, I did.

20 Q. Can you describe what the various areas that you  
21 served?

22 A. Yes. In 1980, I was in the residence retail  
23 channel; in 1986, I moved to small business.

24 Q. Was that after you had that temporary management  
25 assignment that you moved to small business?  
0011

1 A. The temporary assignment was after I moved to  
2 business, yes.

3 Q. What was that temporary assignment?

4 A. I audited Pac Bell records.

5 (Whereupon, Mr. Chang joins the  
6 proceedings.)

7 MR. McDONALD: Q. What kind of business records  
8 did you audit?

9 A. Service orders.

10 Q. What was it that you were checking, the accuracy  
11 of service orders?

12 A. Yes.

13 Q. Prior to 1980, were you employed by Pacific?

14 A. No.

15 Q. Were you employed by any other employer prior to  
16 1980 on a full-time basis?

17 A. Yes.

18 Q. Who was that?

19 A. B & B Trucks.

20 Q. How long were you employed there?

21 A. Since I was nine years old.

22 Q. You served a variety of functions at B & B

23 Trucks?

24 A. You bet, for my father.

25 Q. Are you a high school graduate?

0012

1 A. Yes, I am.

2 Q. Did you attend any college?

3 A. I attended, yes.

4 Q. Did you obtain any degree?

5 A. No.

6 Q. Where did you attend college?

7 A. San Bernardino Valley College.

8 Q. Do you have any other formal sort of educational

9 programs that you have attended that have resulted in your

10 obtaining some designation or certification of some kind?

11 A. No.

12 Q. Currently, who do you report to?

13 A. Don Griffin.

14 Q. How long have you reported to Mr. Griffin?

15 A. Since January 1997.

16 Q. Do you know w

21 A. Since I was nine years old.

22 Q. You served a variety of functions at B & B

23 Trucks?

24 A. You bet, for my father.

25 Q. Are you a high school graduate?

0012

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10 obtaining some designation or certification of some kind?

11 A. No.

12 Q. Currently, who do you report to?

13 A. Don Griffin.

14 Q. How long have you reported to Mr. Griffin?

15 A. Since January 1997.

16 Q. Do you know what his title is?

17 A. Director.

18 Q. Director of something?

19 A. Uhm-hum.

20 Q. Just a director in the industry markets group?

21 A. Yes.

22 Q. Are his responsibilities specific to resale?



25 Q. Is Mr. Phelps still in the position of executive  
0014

1 director?

2 A. Yes.

3 Q. Does Mr. Griffin report to him?

4 A. No.

5 Q. Do you know who Mr. Griffin reports to?

6 A. John Stankey.

7 Q. Is Mr. Phelps still involved in resale?

8 A. Yes.

9 Q. In what way?

10 A. He has the facility side of resale.

11 Q. Do you know what facility side of resale?

12 A. No.

13 Q. What are the other side or sides of resale?

14 A. There's resale of Plain Old Telephone Service,

15 and then there is the facility side of resale.

16 Q. And you work in the former, the Plain Old

17 Telephone?

18 A. Yes.

19 Q. And Mr. Phelps used to have responsibility for

20 both those aspects of resale?

21 A. Yes.

22 Q. Currently, he only has responsibility for the

23 facility side?

24 A. Yes.

25 Q. Who currently reports to you?

0015

1 A. I have a staff of managers reporting to me.

2 Q. How many managers are there?

3 A. Four.

4 Q. Who are they?

5 A. Piper Bain --

6 Q. Spell the names.

7 A. Piper Bain, P-i-p-e-r, B-a-i-n; Peter Lopez;

8 Marlene Smith; Charlene Hicks, H-i-c-k-s.

9 Q. Other than those four individuals, are there

10 other Pacific Bell employees who are subordinate to you?

11 A. Not directly to me, no.

12 Q. Are there employees who are subordinate to those

13 four managers?

14 A. Yes.

15 Q. Currently, how many employees are subordinate to

16 those four managers?

17 A. About 70 people.

18 Q. All those people work on the resale side?

19 A. Yes.

20 Q. Where you work, is that a place that's commonly

21 called the LISC, L-I-S-C?

22 A. Yes.

23 Q. What does LISC stand for?

24 A. Local Interconnect Service Center.

25 Q. Am I correct to understand there are two  
0016

1 separate LISCs, one that deals with resale of the

2 telephone service and another deals with facilities based

3 interconnection?

4 A. Yes.

5 Q. So when we talk about the LISC with you, we are  
6 talking about only the LISC dealing with resale?

7 A. Yes.

8 Q. The LISC is located at, what did you say, 370  
9 Third Street?

10 A. Yes.

11 Q. It's entirely contained on the third floor of  
12 that building?

13 A. Yes.

14 Q. Do you know how many employees currently work  
15 within the LISC, is it the 70 that you mentioned earlier?

16 A. No.

17 Q. How many employees, then, work there currently?

18 MR. KOLTO-WININGER: Just so you know, the  
19 number has been disclosed. I don't know if you know it  
20 personally. You may not know the number, but so that you  
21 are not concerned about proprietary information.

22 THE WITNESS: It's approximately 180.

23 MR. McDONALD: Q. In an organizational chart,  
24 if one existed, would those 180 employees at the LISC  
25 report to individuals who ultimately would report to you?  
0017

1 A. Some of them.

2 Q. But not all of them?

3 A. Correct.

4 Q. Is that the 70 that you mentioned earlier, those  
5 70 are people who report -- who either report to you or

8 Q. Are the four of you considered to be at the same  
9 level within Pacific Bell, business managers with  
10 responsibilities at the LISC?

11 A. Yes.

12 Q. For each of you, are your responsibilities  
13 solely at the LISC?

14 A. Yes.

15 Q. Have you been at the LISC longer than any of the  
16 other business managers?

17 A. Yes.

18 Q. Is there a division of responsibility among the  
19 four of you for functions being served at the LISC?

20 A. Yes.

21 Q. What is that division?

22 A. Specific to me?

23 Q. Among the four of you. For example, does one  
24 person deal with the green paper, and another person deals  
25 with the yellow paper, whatever the division is?

0019

1 A. My responsibilities include customer care.

2 Q. What else?

3 A. All customer meetings and interface with a  
4 customer.

5 Q. And the customers of the LISC are the CLCs; is  
6 that right?

7 A. Yes.

8 Q. How about the other three individuals, what do  
9 they do different than you?

10 A. Nina Ganoza has the production side of the LISC;  
11 Chuck McDonnell handles expedites and escalations; Gracie  
12 Gutierrez handles order volumes.

13 Q. Has each of the other three business managers of  
14 the LISC been there -- well, how long has each of the  
15 other three been there?

16 A. Chuck arrived in February.

17 Q. Of '97?

18 A. Yes. Nina started in November of '96; Gracie  
19 started in July of '96.

20 Q. On a day-to-day basis, who is the most senior  
21 manager present at the LISC?

22 A. I wouldn't be able to answer that question. I  
23 don't know who the senior manager is.

24 Q. Well, so you are not the most senior person at  
25 the LISC on a regular day-to-day basis?  
0020

1 A. Well, define senior manager.

2 Q. There is a hierarchy. You are able to tell me  
3 who you report to and who reports to you, right?

4 A. Uhm-hum.

5 Q. On a day-to-day basis, who is the most senior  
6 person present at the LISC?

7 A. Don Griffin.

8 Q. He is there virtually every day? You need to  
9 speak.

10 A. Yes, he is there every day.

11 Q. Is there anyone more senior than him who has an

12 office or some kind of location at the LISC?

13 A. At the LISC, no.

14 Q. When you joined -- or when you were assigned to

15 your current position in July of 1995, what were you

16 informed would be your duties?

17 A. That I would be the LISC manager, business

18 manager.

19 Q. Did you receive any kind of a written

20 description of what your job functions would be?

21 A. No.

22 Q. What did you understand those functions would

23 be?

24 A. That I would be handling resale -- an office

25 that would handle resale for Pacific Bell.

0021

1 Q. Who advised you about the position and what its

2 responsibilities would be?

3 A. Jeff Phelps.

4 Q. And in July of 1995, did the LISC exist

5 physically; was there a facility?

6 A. No, it did not.

7 Q. Were you located at an office in San Francisco

8 when you were hired for that position?

9 A. No.

10 Q. Where were you located at the time?

11 A. In Los Angeles.

12 Q. So you had to make a move to take this position?

13 A. Yes, I did.

14 Q. Was that at or about July 1995?

15 A. Yes, it was.

16 Q. What were your first tasks in this position in  
17 1995?

18 A. I would say that I attended a lot of meetings,  
19 tried to bring myself up to speed on resale, because it  
20 was new to me.

21 Q. Were those meetings intended to plan for the  
22 LISC operation?

23 A. Some of them were.

24 Q. What else were the meetings intended to -- what  
25 else did the meetings -- what else was discussed at those  
0022  
1 meetings?

2 A. Resale, resale products.

3 Q. Who attended those meetings?

4 A. A variety of people.

5 Q. Within Pacific Bell?

6 A. Yes.

7 Q. Were people outside of Pacific Bell involved?

8 A. Yes.

9 Q. Can you categorize the types of meetings that --

10 A. Half the meetings dealt with planning for the  
11 LISC and a third of the meetings dealt with anticipating  
12 resale products.

13 Q. Is there some way of grouping or categorizing  
14 the meetings, the subjects that were discussed?

15 A. No, that would be very difficult.

16 Q. Over what period of time did the meetings take  
17 place?

18 A. From July of '96 -- no, July of 1995 through  
19 current.

20 Q. Besides attending meetings, what else did you  
21 do, say, for the time period in 1995, in your position as  
22 a business manager who is going to be principally  
23 responsible for the LISC? What else did you do during  
24 that six-month period?

25 A. Other than attend meetings?  
0023

1 Q. Uhm-hum.

2 A. I'd say studied a lot, to learn the resale.

3 Q. Did you participate in the preparation of any  
4 reports or analyses as to resale?

5 A. Yes, I participated.

6 Q. Can you describe what your participation  
7 involved, what the subject matters were?

8 A. I am not sure I understand the question.

9 Q. I think you testified that you did participate  
10 in the preparation of some reports, and I want to focus  
11 initially on the 1995 time period so that we are talking  
12 about a six-month period. And during that period of time,  
13 there was no resale going on; is that right?

14 A. Correct.

15 Q. So this was a time presumably that was being  
16 devoted to the planning for the operation of the LISC?

17 A. Correct.



20 her staff?

21 A. Business process issues.

22 Q. Can you identify what those issues are?

23 A. Order design was discussed, what forms needed --

24 what the resale forms needed to look like that would be

25 sent from the CLCs to Pacific Bell.

0025

1 Q. So your discussions with Leslie Wood focused on

2 some of the processes that would be used to effectuate the

3 resale business; is that right?

4 A. Yes.

5 Q. And -- am I correct to understand -- maybe you

6 can tell me what your belief is -- in the planning process

7 for setting up the LISC, you had to look at a variety of

8 factors, one of them being processes that would be used?

9 A. Yes.

10 Q. Did Pacific Bell also have to consider what

11 systems would be used, computer systems?

12 A. Yes.

13 Q. Both hardware and software?

14 A. Yes.

15 Q. And also the personnel?

16 A. Yes.

17 Q. Both the number of people and the training that

18 would be required for those people?

19 A. Yes.

20 Q. Did you consider each of those three different

21 areas in your work in doing the planning for the LISC?